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AND SRI LANKA

March 9, 2021

VIA EMAIL

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Re: **In re Valsartan, Losartan, and Irbesartan Products Liability Litigation**
Civ. No. 19-2875 (D.N.J.)

Counsel:

We were surprised to receive your March 6, 2021, requesting production of certain documents listed on the ZHP Parties' privilege log only two business days prior to Mr. Wang's deposition and following the Parties' productive meet and confer on documents relating to the Rule 30(b)(6) topics in which Mr. Wang had been designated, during which documents withheld for privilege were not mentioned.

Nonetheless, defendants Princeton Pharmaceutical, Inc. ("Princeton") and Solco Healthcare U.S., LLC ("Solco"), and Huahai U.S., (collectively "ZHP Parties") are producing documents through the Aquipt document repository as production volumes SOLCO015 (SOLCO00189645-SOLCO00189707) and PRINSTON030 (PRINSTON00469182-PRINSTON00469232), pursuant to the Court's December 23, 2019 (Doc. 328), April 20, 2020 (Doc. 416), and June 23, 2020 (Doc. 487) Orders and June 3, 2020 instruction in the above-referenced matter and subject to the Discovery Confidentiality Order (Doc. 139, the "DCO").

Duane Morris

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David Stanoch, Esq.
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We continue to withhold CTRL00001090, as it is privileged. This document is a draft notice letter drafted by Vincent Capuano of Duane Morris, who represented Princeton. The letter constitutes a confidential attorney client communication for the purpose of rendering legal advice regarding regulatory compliance and potential in anticipation of Paragraph IV litigation. Contrary to your email, the document is unrelated to any FDA response or deficiency letter.

Additionally, we continue to withhold CTRL00001065 and CTRL0000106, which are confidential attorney-client communications between Duane Morris and the ZHP Parties and Alan Klein for the purposes of rendering legal advice regarding customer relations and anticipated litigation. These documents reflect both the legal advice and mental impressions of counsel.

In addition to documents produced in response to your March 6 email, this production includes the Master Distribution Services Agreement requested by email on March 4.

This production of documents is made subject to the objections made by counsel during the December 11, 2019 conference with Judge Schneider. The ZHP Parties reserve any and all objections as to relevance, materiality, privilege, admissibility, or any other grounds on which an objection may be made.

This production of documents contains document families with responsive documents that are being redacted or withheld on the grounds of privilege or work product.

Very truly yours,

/s/ Barbara A. Schwartz

Barbara A. Schwartz

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